

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

**LINDA J. BLOZIS,**

**Plaintiff,**

**VS.**

**MELLON TRUST OF DELAWARE,  
NATIONAL ASSOCIATION; MELLON  
BANK, NATIONAL ASSOCIATION;  
MELLON FINANCIAL  
CORPORATION,**

**Defendants.**

: CIVIL ACTION NO. 05-891 (SLR)  
:  
:  
:  
:  
:  
:  
:  
:  
:  
:  
:  
:  
:

**DEFENDANTS' MOTION IN LIMINE TO EXCLUDE  
EVIDENCE CONCERNING TERMINATIONS OF OTHER EMPLOYEES**

Defendants Mellon Trust of Delaware, National Association, Mellon Bank, National Association, and Mellon Financial Corporation (collectively, “Defendants”) hereby move this Court, pursuant to Fed. R. Evid. 401, 402 and 403, for an Order in the form attached hereto precluding Plaintiff from presenting evidence concerning the terminations of other employees. The grounds for this motion are set forth fully in the accompanying memorandum of law dated

May 22, 2006, the exhibits thereto, and upon all of the pleadings and proceedings heretofore had herein.

Respectfully submitted,

REED SMITH LLP

By: /s/ Thad J. Bracegirdle

Thad J. Bracegirdle (No. 3691)  
1201 Market Street, Suite 1500  
Wilmington, DE 19801  
(302) 778-7500

Paul P. Rooney (No. 3317)  
599 Lexington Avenue, 28th Floor  
New York, NY 10022

John C. Unkovic (admitted *pro hac vice*)  
435 Sixth Avenue  
Pittsburgh, PA 15219

Stephanie Wilson (admitted *pro hac vice*)  
Princeton Forrestal Village  
136 Main Street, Suite 250  
Princeton, New Jersey 08540  
(609)-987-0050

Attorneys for Defendants, Mellon Trust of  
Delaware National Association, Mellon Bank,  
National Association, and Mellon Financial  
Corporation.

Dated: May 22, 2007

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE

---

LINDA J. BLOZIS

Plaintiff,

vs.

MELLON TRUST OF DELAWARE,  
NATIONAL ASSOCIATION; MELLON  
BANK, NATIONAL ASSOCIATION;  
MELLON FINANCIAL  
CORPORATION

Defendant.

---

:  
:  
: CIVIL ACTION NO. 05-891 (SLR)  
:  
:  
:  
:  
: CERTIFICATE OF SERVICE  
:  
:  
:  
:  
:

I, Thad J. Bracegirdle, being a member of the Bar of this Court, do hereby certify  
that on May 22, 2007, I caused a true and correct copy of **DEFENDANTS' MOTION IN  
LIMINE TO EXCLUDE EVIDENCE CONCERNING TERMINATIONS OF OTHER  
EMPLOYEES** to be served by electronic filing with the Court upon the following counsel:

John M. LaRosa, Esq.  
Delaware Bar No. 4275  
Two East 7<sup>th</sup> Street, Suite 302  
Wilmington, DE 19801-3707  
Attorneys for Plaintiff

Thomas S. Neuberger, Esquire  
Delaware Bar No. 243  
Two East Seventh Street, Suite 302  
Wilmington, DE 19801  
Attorneys for Plaintiff

s/Thad J. Bracegirdle  
Thad J. Bracegirdle (No. 3691)